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*Attorneys for Defendant*  
**LEFRAK ORGANIZATION, INC.**

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

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UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

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GABRIEL SANDOVAL (AND WIFE, SHAYLA  
RIVERA),

Case No.:  
08-CV-2711

Plaintiff,

-against-

BFP ONE LIBERTY PLAZA CO., LLC, BLACKMON-  
MOORING-STEAMATIC CATASTROPHE, INC.  
D/B/A BMS CAT, BROOKFIELD FINANCIAL  
PROPERTIES, INC., EMPIRE STATE PROPERTIES,  
INC., GENERAL RE SERVICES CORP., HILLMAN  
ENVIRONMENTAL GROUP, LLC., LEFRAK  
ORGANIZATION, INC., NATIONAL  
ASSOCIATION OF SECURITIES DEALERS, INC.,  
NEW LIBERTY PLAZA LP, NEW YORK CITY  
INDUSTRIAL DEVELOPMENT AGENCY, NEW  
YORK CITY INDUSTRIAL DEVELOPMENT  
CORPORATION, ONE LIBERTY PLAZA, THE  
BOARD OF MANAGERS OF THE ONE LIBERTY  
PLAZA CONDOMINIUM (CONDO #1178), WFP ONE  
LIBERTY PLAZA CO., L.P., WFP ONE LIBERTY  
PLAZA, CO. GP, CORP., AND WORLD FINANCIAL  
PROPERTIES, L.P.,

**NOTICE OF ADOPTION  
OF ANSWER TO MASTER  
COMPLAINT OF LEFRAK  
ORGANIZATION, INC.**

Defendants.

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**PLEASE TAKE NOTICE THAT** defendant, LEFRAK ORGANIZATION, INC., as  
and for its response to the allegations set forth in the Complaint by Adoption (Check-Off  
Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts

its Verified Master Answer dated July 30, 2007, which was filed in the matter of In Re: World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH). LEFRAK ORGANIZATION, INC. has filed a Master Disclosure of Interested Parties in 21 MC 102 (AKH), and as such, is exempt from having to file such a disclosure in this specific matter, pursuant to the provisions of Case Management Order No. 4 (¶ J(2)).

**WHEREFORE**, LEFRAK ORGANIZATION, INC. demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements.

Dated: New York, New York  
May 3, 2008

Yours, etc.,

**HARRIS BEACH PLLC**

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BFP ONE LIBERTY PLAZA CO., et al.,

**CERTIFICATE OF  
SERVICE**

Defendants.

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The undersigned certifies that on May 3, 2008, I caused to be filed and served the following documents electronically via the Court's ECF system upon the parties:

1. Notice of Adoption of Answer to Master Complaint of Lefrak Organization, Inc.

Dated: New York, New York  
May 3, 2008

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Brian A. Bender

275703.1

IN RE: WORLD TRADE CENTER LOWER  
MANHATTAN DISASTER SITE LITIGATION

21 MC 102 (AKH)

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